

Randi Lane Maidman, Esq.
Jones Law Firm, P.C.
43 W 43rd Street, Suite 180
New York, NY 10036
(212) 258-0685
Randi.m@joneslawnyc.com

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Law Firm P.C.

September 12, 2018
Magistrate Judge Ramon E. Reyes, Jr.
United States District Court
Eastern District of New York
225 Cadman Plaza East, Room N208
Brooklyn, New York 11201

Re: Bonikos et al. v. 50 Front Street Enterprises, Inc. et al.,
1:17-cv-06076 (ARR) (RER)

Dear Magistrate Judge Reyes:

Jones Law Firm, P.C. was retained this week as counsel for Defendants in the above referenced action. Jones Law Firm, P.C. filed a Substitution of Counsel for Defendants' prior counsel, the Law Offices of Michael Chong, L.L.C. today, September 12, 2018.

I understand that the Joint Pre-Trial Order is currently due to be filed on September 28, 2018. In order to have sufficient time to get up to speed on this matter, including reviewing the extensive discovery that has been completed in this matter, I ask for a short, 2 week extension to file the Joint Pre-Trial Order.

When my office first contacted Plaintiffs' counsel, Anthony Portesy, about this request over the weekend, he agreed to the extension. In fact, he offered to draft the letter to the Court. Late Monday afternoon, he notified my office that he actually would object to this request, but only because Defendants' former counsel is technically still counsel of record, as the Consent Order Granting Substitution of Counsel form has not yet been So Ordered by Judge Ross. Thus, I was quite surprised to read Mr. Portesy's letter of this afternoon to Your Honor in which he opposed both the substitution of counsel and this extension request.

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Mr. Portesy provides no solid basis for opposing the substitution of counsel. It is fundamental in our adversary system that litigants be able to choose their representation. Moreover, it is quite circumspect that Mr. Portesy would object to the substitution after the litany of complaints he launches against Defendants' original counsel, all of which serve to support the need for the substitution of counsel.

The extension requested is short and will, in the end, serve all parties, the Court and the interest of justice as it will allow Jones Law Firm, the firm that will be trying the case, to fully participate in the pre-trial order.

With further regards to the complaints Mr. Portesy makes about opposing counsel's handling of this matter, we would ask that the Court reserve its ruling on these matters until two weeks from today's date or we have had a chance to review the matter fully and respond.

I thank you in advance for your attention to this important and timely matter.

Respectfully Submitted,

/s/ Randi Lane Maidman
Randi Lane Maidman